

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CHLOÉ, S.A.S., J. CHOO LIMITED,

Civil Action No.: 07 CV 6491 (WHP)

Plaintiffs,

- against -

KEN CHEN a/k/a SHU CHEN a/k/a XIANG  
CHEN, DANIEL DOE, GODDESS  
TRADING d/b/a  
GODDESSTRADING@HOTMAIL.COM,  
LUXUNG GOODS, LUXURY GOODS,  
TERRY DOE d/b/a  
AZNTERRY911@HOTMAIL.COM, JASON  
DOE d/b/a JARRY326@YAHOO.COM.CN,  
FASHION HANDBAGS, BENNY DOE,  
JEANCARLO DOE, JOSEPH a/k/a JOSE  
DOE, SISI a/k/a CECI DOE, TOP LUXURY  
HANDBAGS d/b/a  
LUXURYHANDBAGS277@YAHOO.COM,  
FRANCISCO DOE, BEN DOE, CARLOS  
DOE, INSTYLE LUXURY HANDBAGS,  
CORINA DOE a/k/a QIMIAO HU a/k/a QI  
MIAO HU, KENNY DOE a/k/a YE GUO  
a/k/a GUO Q YE, NEWCOME TRADING  
d/b/a TOSCA, QUICK GLOBAL SHIPPING,  
HOWARD EXPRESS SHIPPING, RANDY  
DOE, and various JOHN and JANE DOES 1-  
10 and XYZ COMPANIES  
(UNIDENTIFIED),

Defendants.

**DECLARATION OF JAKE ARNOLD IN  
SUPPORT OF PLAINTIFFS'  
MEMORANDUM OF LAW IN REPLY TO  
DEFENDANTS PSK AMERICA, INC.'S AND  
JAE MAN YOO'S SUPPLEMENTAL  
OPPOSITION TO PRELIMINARY  
INJUNCTION AND REQUEST FOR  
DISSOLUTION AND MODIFICATION OF  
COURT'S ORDERS.**

I, GEORGE "JAKE" ARNOLD, IV, under penalty of perjury, hereby declare as follows:

1. I am a licensed investigator in the State of North Carolina. I have been employed by George Arnold & Associates ("GAA") of Shelby, North Carolina since October 2002. I have participated in and/or conducted over one hundred and fifty (150) trademark investigations involving counterfeit and infringing goods, as well as diverted

goods (i.e., “gray market” goods). I am extremely familiar with investigations regarding counterfeit handbags and other luxury items.

2. I make this declaration in support of Plaintiffs’ Supplemental Reply to Defendants P.S.K. America, Inc. (“PSK”) and Jae Man Yoo (“Yoo”) (collectively, “PSK Defendants”) Supplemental Opposition to Plaintiffs’ *ex parte* Application for a Temporary Restraining Order, Seizure Order, Order to Show Cause for a Preliminary Injunction, Expedited Discovery Order, Order Restraining Assets and Order Sealing File (“TRO”) as it applies to the PSK Defendants. If called as a witness, I could testify to the following upon personal knowledge and/or upon my review of GAA’s files on this matter.

3. On July 20, 2007, I participated in the execution of the TRO at various locations, including 420 Broadway,<sup>1</sup> New York, NY 10013 (“PSK Premises”). The layout of the PSK Premises gives the appearance of a single large store with a few sections, though there are no walls or other physical barriers dividing these sections. Entering the store from Broadway, there is a small area of sunglasses, followed by a larger area of handbags, some in a glass case. A counter-top where a cash register and credit card machine are located ends toward the back of the store, just a few feet from the glass case of handbags. Continuing through the store past the cash register area, there is an area of jewelry.

4. I served Yoo with the Summons, Complaint, and TRO, both individually and on behalf of PSK. Yoo informed me that the PSK Premises was actually broken down into a number of spaces that he sub-leased to various merchants. Yoo also

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informed me that the area of handbags was sub-leased to an individual known as "Benny."

5. At the PSK Premises, I also located a storage room where the vendors at the PSK Premises kept their inventory. This storage room contained, among other merchandise, handbags and jewelry. Entering the storage room from its only door, the first thing I saw was handbags, many bearing Plaintiffs' Marks which were then seized. The storage room appeared to be under the control of Benny and PSK. According to Yoo, both Benny and PSK had access at any time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 9, 2007 at Shelby, North Carolina.



George "Jake" Arnold, IV

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